

R E M A R K S

Upon entry of this Response, claims 1,9, 11, 13-15, 17, 20-22 and 24-29 will be amended, and claims 2-4, 10, 18, and 23 will be canceled. No new matter has been added.

Reconsideration and further examination are respectfully requested in view of the following remarks.

The claims stand rejected under 35 USC 103 as being unpatentable over US Patent No. 6,614,206 ("Wong") and various other references.

As amended, claim 1 recites "using a battery charging circuit to transfer power from a laptop computer system" to different types of receiving devices in a network. Moreover, the battery charging circuit "transfer[s] power through an inductive coupling charge transmitter in a lid of the laptop computer system to the receiving devices." For example, FIG. 4 of the present application illustrates how power may be inductively provided via a lid of a laptop computer system.

Applicants respectfully suggest that the references, taken alone or in combination, do not teach or suggest such an invention.

For example, Wong discloses that a laptop computer may provide power to other devices via a Universal Serial Bus (USB) cable.

Van Lerberghe discloses that a cradle may provide power to a single wireless telephone via an induction charging interface.

Matsuda discloses that a laptop computer may provide power to other devices via a USB cable.

Keai discloses that a laptop computer may provide power to a wireless telephone via a USB cable.

Thus, none of the references disclose transferring power through an inductive coupling charge transmitter in a lid of the laptop computer system to a plurality of receiving devices as is now recited in claim 1.

Moreover, in rejecting claims under 35 U.S.C. § 103, the Examiner bears the initial burden of presenting a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by presenting evidence that would have led one of ordinary skill in the art to arrive at the claimed invention. A broad conclusory statement regarding the obviousness of modifying a reference, standing alone, is not evidence.

According to the Final Office, it would have been obvious to modify the system of Wong based on the teachings of Van Lerberghe as follows:

to eliminate the need to carry ... cables for each device to connect the system.

(Office Action, top of page 3). Appellants respectfully disagree that such reasoning supports modification of Wong to produce the invention as claimed in claim 1. The teaching or suggestion to make the claimed combination must be found in the prior art, and not based on the Applicants' disclosure. The fact that references can potentially be modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. The absence of any motivation in the prior art to modify the references in the ways recited in the pending claims indicates that the Examiner has simply recognized a benefit provided by the present invention (*e.g.*, solving the problem described at the bottom of page 1 of the present application), and then used that benefit as a motivation to combine the references – the essence of impermissible hindsight reconstruction.

Because there is no teaching or suggestion to modify the references in this way, a *prima facie* case of obviousness has not been established. Applicants respectfully request reconsideration of the rejection.

The remaining claims depend from claim 1 or recite limitations similar to those described above with respect to claim 1, and should therefore also be allowable.

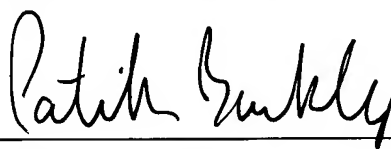
Moreover, claim 13 as amended now recites that a determination of an amount of power to transfer “includes negotiating the amount of power” with a receiving device. None of the references, taken alone or in combination, disclose such a “negotiation.” This is an additional reason when claim 13 should be allowable.

Applicants’ silence with respect to certain comments made in the Office Action (*e.g.*, associated with various dependent claims) is not an indication that the Applicants agree with those comments.

CONCLUSION

Accordingly, Applicants respectfully request allowance of the pending claims. If any issues remain, or if the Examiner has any further suggestions for expediting allowance of the present application, the Examiner is kindly invited to contact the undersigned via telephone at (203) 972-0191.

Respectfully submitted,



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Date